

STATE OF SOUTH CAROLINA
COUNTY OF LAURENS

IN THE COURT OF COMMON PLEAS

Carol Boyd,

Plaintiff,

v.

Waffle House, Inc.

Defendant.

Civil Action No. 2023-CP-30-0422

TO: ANDREW LINDEMANN, ESQ., LINDEMANN LAW FIRM, P.A., 5 CALENDAR COURT, SUITE 202, POST OFFICE BOX 6923, COLUMBIA, SOUTH CAROLINA, COUNSEL FOR DEFENDANT

**PLAINTIFF'S RESPONSES TO
DEFENDANT'S FIRST SET OF REQUESTS FOR ADMISSIONS TO PLAINTIFF**

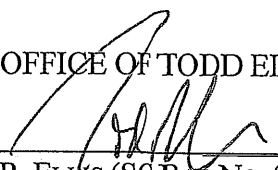
1. The total value of all claims asserted by the Plaintiff in this litigation is less than 75,000.01.

RESPONSE: DENIED.

2. In the event the court or jury returns a verdict of \$75,000.01 or greater, the Plaintiff consents to a remittitur to \$75,000.00.

RESPONSE: DENIED.

LAW OFFICE OF TODD ELLIS, P.A.

BY: 
TODD R. ELLIS (SC BAR No. 08888)
7911 Broad River Road, Suite 100
Irmo, South Carolina 29063
(803) 732-0123
todd@toddellislaw.com

LAW OFFICE OF JERRY REARDON

Jerry Reardon (SC Bar No. 13739)
1722 Main Street, Suite 302

Columbia, South Carolina 29201
(803) 602-5242
jerry@jerryreardonlaw.com

Attorney for Carol Boyd

June 26, 2023